

AO 91 (Rev. 11/11) Criminal Complaint

United States Courts
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

JUL 24 2018

for the

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America)

v.)

Case No. C-18-2664M

RAYMOND, Thaddeus, Leo)

STURTZ, Allen, Chance)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/23/2018 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C., 846

Knowingly, intentionally, and unlawfully
conspired with the intent to distribute
a controlled substance in Schedule I of
the Controlled Substance Act of 1970,
to wit: 0.42 kilograms of
methamphetamine. (AGW)

This criminal complaint is based on these facts:

See Attachment

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

JUL 24, 2018

City and state: Corpus Christi, Texas

Complainant's signature

Orlando Alvarez, Task Force Officer

Printed name and title

Judge's signature

Jason B. Libby, U.S. Magistrate Judge

Printed name and title

ATTACHMENT "A"

RAYMOND, Thaddeus, Leo
STURTZ, Allen, Chance

On July 23, 2018, Officers from the Department of Public Safety conducted a traffic stop in the 4700 block of Alameda Street in Corpus Christi, Texas, which resulted in the seizure of 0.42 kilograms of methamphetamine and the arrest of Thaddeus Leo RAYMOND and Allen Chance STURTZ.

On July 23, 2018, agents from the DEA Corpus Christi Resident Office and the Texas Department of Public Safety established surveillance in the vicinity of 2800 Santa Fe Street in Corpus Christi, Texas. At approximately 1:50 p.m., agents observed a gold Chevrolet Equinox traveling East in the 2800 block of Santa Fe Street driven by RAYMOND. Agents conducted surveillance of RAYMOND until arriving at an apartment complex located in the 4300 block of Ocean Drive. It was at this time that agents observed RAYMOND park the Chevrolet Equinox at the location and exit his vehicle carrying a bag. Agents then observed RAYMOND leave the location in a white Chevrolet Tahoe driven by STURTZ. Agent's maintained surveillance of RAYMOND and STURTZ until Texas Department of Public Safety Officers conducted a traffic stop of the white Tahoe in the 4700 block of Alameda Street in Corpus Christi, Texas, for an inoperable high mounted stop lamp which is a violation of the Federal Motor Vehicle Safety Standards.

Upon approaching the driver's side of the vehicle officers smelled the odor of marijuana coming from the vehicle. Officers then asked why the odor of marijuana was coming from the vehicle, where at which time RAYMOND responded that it was him as he was smoking marijuana earlier in the day. Due to the odor of marijuana coming from the vehicle, RAYMOND and STURTZ were asked to exit the vehicle for officers to conduct a probable cause search of the vehicle. At this time RAYMOND informed officers that he was carrying a pistol that was located inside his waistband which was subsequently removed from RAYMOND's person by officers. A search of the vehicle resulted in

officers locating approximately 0.42 kilograms of methamphetamine inside a backpack on the passenger side floorboard. It was at this time that both subjects were placed under arrest.

RAYMOND was read his Miranda Warning by TFO Flores as witnessed by TFA Pina. RAYMOND acknowledged he understood his rights and agreed to answer questions. RAYMOND admitted to possessing the methamphetamine and stated he was on his way to deliver it to an individual who RAYMOND had sold to in the past.

STURTZ was read his Miranda Warning by SA Schuetz as witnessed by SA Jenne. STURTZ acknowledged he understood his rights and agreed to answer questions. STURTZ stated that the methamphetamine was his and he had given it to RAYMOND for distribution purposes.

Both subjects were then taken to their respective residences where STURTZ and RAYMOND gave written and verbal consent to search their residences.

A search of RAYMOND's residence resulted in agents locating three handguns and one shotgun. Also found, were amounts of methamphetamine, heroin, and marijuana.

A search of STURTZ's residence resulted in agents locating one handgun, methamphetamine, various pills, and marijuana.

AUSA Brittney Jensen authorized Federal Prosecution in this case.